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9 Remo Ibrahim and Courtney Schirf

10
11 **UNITED STATES DISTRICT COURT**
12 **CENTRAL DISTRICT OF CALIFORNIA**
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14 RONEN HELMANN,

15 Plaintiff,

16 vs.

17 CODEPINK WOMEN FOR PEACE, a California
18 entity, CODEPINK ACTION FUND, a California
19 entity, HONOR THE EARTH, a Minnesota entity,
20 COURTNEY LENNA SCHIRF, and, REMO
21 IBRAHIM, d/b/a PALESTINIAN YOUTH
22 MOVEMENT, and JOHN AND JANE DOES 1-
23 20,

24 Defendants.
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Case No. 2:24-CV-05704-SVW-PVC

**JOINT STIPULATION AND (PROPOSED)
ORDER REGARDING BRIEFING
SCHEDULE AND THE MOTION TO
CONSOLIDATE THIS CASE WITH 2:24-
cv-06253**

The Hon. Stephen V. Wilson

Hearing Date: December 9, 2024

Time: 1:30

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3 1. STANDWITHUS CENTER FOR LEGAL JUSTICE (hereinafter "SCLJ")
4 and RONAN HELMANN have filed a motion to consolidate their cases (Dkt. 58).
5 The motion is set to be heard on December 9, 2024.

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7 2. SCLJ and RONAN HELMANN intend to file an amended complaint, either
8 jointly (if the cases are consolidated) or independently if they are not.

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10 3. At present, the deadline for COURTNEY SCHIRF to file a pleading
11 responsive to HELMANN'S complaint is November 18, 2024. This would require
12 SCHIRF to brief a motion to dismiss, HELMANN to draft and file its opposition, and it
13 may, depending upon calendaring, require this Court to review the briefing
14 regarding a complaint that HELMANN intends to amend.

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17 4. At present, the deadline for REMO IBRAHIM to file a responsive pleading to
18 HELMANN'S complaint is November 18, 2024. This would require IBRAHIM to brief a
19 motion to dismiss, HELMANN to draft and file its opposition, and it may, depending
20 upon calendaring, require this Court to review the briefing regarding a complaint
21 that HELMANN intends to amend.

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24 5. HELMANN, SCHIRF, AND IBRAHIM respectfully suggest that is not a
25 good use of judicial resources and is also wasteful for the parties.

1 **HELMANN, SCHIRF, and IBRAHIM therefore agree as follows:**

2 SCHIRF AND IBRAHIM do not oppose Plaintiffs' Motion to Consolidate; and
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4 SCHIRF AND IBRAHIM will have thirty (30) days from the filing of an
5 amended or consolidated complaint in which to file its responsive pleading.
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7 Dated: November 15, 2024

Respectfully submitted,

8 **LAW OFFICE OF THOMAS B. HARVEY**
Thomas B. Harvey

9 By: /s/ Thomas B. Harvey
10 Attorney for Defendant REMO IBRAHIM

11 Dated: November 15, 2024

Respectfully submitted,

12 **JAVITCH LAW OFFICE**
Mark L. Javitch

13 By: /s/Mark L. Javitch
14 Attorney for RONEN HELMANN
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